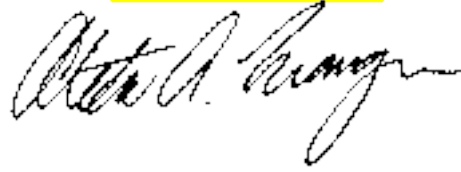


UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED.



UNITED STATES OF AMERICA)

v.)

ISAAC DONNELL FULLER)

No. 3:12-CR-00108
JUDGE TRAUGER

**MOTION AND INCORPORATED MEMORANDUM TO CONTINUE TRIAL
AND EXTEND PRETRIAL DEADLINES**

Undersigned counsel for Defendant Isaac Fuller respectfully moves this Court to continue the trial set for October 29th, 2013, and to extend deadlines for the filing of any pre-trial motions, or submission of any Plea Agreement. In support of this Motion to Continue, counsel submits the following facts and arguments:

1. Mr. Fuller has agreed to a continuance both verbally and in writing. On October 21st, 2013, Mr. Fuller executed a new Speedy Trial Waiver under the Plan For Prompt Disposition of Criminal Cases, which is specific to the upcoming trial date. Undersigned counsel has already filed that new Speedy Trial Waiver (Docket No. 49).

2. This is an unopposed Motion to Continue. Undersigned counsel consulted with Assistant United States Attorney Clay Lee, who has advised that the Government does not oppose this continuance of the trial date and an extension of deadlines.

3. Counsel avers that the ends of justice served by this continuance outweigh the interests of the public and Defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A). Counsel avers that he is not requesting this continuance merely for purposes of delay, but rather is seeking additional time to ensure effective assistance of counsel, and to finalize ongoing settlement discussions prior to any trial or motions hearing. *Id.*